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Simoniz USA, Inc.*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

DENNIS MENG,

Plaintiff,

vs.

SIMONIZ USA, INC., a Connecticut
Corporation; DOES I-X; ROE BUSINESS
ENTITIES I-X,

Defendants.

Case No. 2:21-cv-02143-RFB-VCF

**STIPULATION AND ORDER TO
CORRECT DISPOSITIVE MOTION
DEADLINES AND SCHEDULING
ORDER**

IT IS HEREBY STIPULATED by and between Defendant Simoniz USA, Inc. (“Defendant”) by and through its counsel of record, Jackson Lewis, P.C., and Plaintiff Dennis Meng (“Plaintiff”), by and through his counsel Kemp & Kemp, as follows:

1. On August 9, 2022, the Court entered an Order granting the Stipulated Discovery Plan and Scheduling Order submitted by the parties. ECF No. 21. Discovery is currently set to close December 6, 2022. *Id.* at 4:11-14.

2. In the prior stipulation, the parties intended to extend all deadlines in the existing scheduling order by 90 days. *Id.* at 3:3-5; 4:15-16. However, the stipulation and proposed order inadvertently identified October 9, 2022 as the deadline for dispositive motions, which is before the close of discovery.

3. The parties now seek that the dispositive motion deadline be corrected to **January 5, 2023** which is 30 days following the close of discovery.

This stipulation and order is sought in good faith and not for the purpose of delay.

Dated this 5th day of October, 2022.

KEMP & KEMP, ATTORNEYS AT LAW

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/s/ James P. Kemp

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ORDER

IT IS SO ORDERED October 6, 2022.

~~U.S. District Judge~~/Magistrate Judge

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